ADA Gagne-

Since the submitted items regarding this case were brought to the drug lab on two separate days and analyzed by two different chemists, there is more than one set of material enclosed in this packet. Furthermore, to reduced redundancy, some discovery items (such as the SOPs) will only be given once and, in those cases, I will notify you as to which part of the packet the information is in. I believe that I have covered all of the items requested, but if I have inadvertently left something out or if there are any questions regarding the material provided, please feel free to contact the lab.

Respectfully,

Sonja J. Farak
Chemist II
Drug Analysis Lab

Drug Lab #s: [redacted]

Submitted to the drug lab on January 15, 2010
Analyzed by Sonja Farak

Drug Lab #s: [redacted]

Submitted to the drug lab February 5, 2010
Analyzed by Rebecca Pontes

Commonwealth v. [redacted]

Chemist Discovery Packet

1. *Case File:* Enclosed are three separate case files (the information that is normally requested by defense attorneys): one for [redacted] & [redacted], a second for [redacted] & [redacted], and a third for [redacted] through [redacted] Although the first two sets of numbers were submitted on the same day, the submissions were analyzed on separate days and, therefore, two case files were prepared as some of the information varies (i.e. chain of custody, date run on GC/MS, etc.).

2. *Reagent Solution:* See the included Cocaine and Crack SOP as well as the Tablet SOP for a list of reagents used. These SOPs can be found in the discovery packet from Rebecca Pontes. For dissolving the samples, Sonja Farak used Methanol whereas Rebecca Pontes used Ethanol.

3. *Drug Testing Equipment:* Listed in SOPs as well as on computer printouts.

Sonja Farak:	balance: AND FX2000 balance (analytical): OHAUS EXPLORER PRO 214-C (EP214C) microscope: OLYMPUS BH2 POL Gas Chromatograph (GC): HP 6890 GC Gas Chromatograph/Mass Spectrometer (GC/MS): HP 6890/5973
Rebecca Pontes:	balance: AND FX2000 balance (analytical): OHAUS EXPLORER (E12140) microscope: LEICA ATC 2000 POL Gas Chromatograph (GC): HP 6890 GC Gas Chromatograph/Mass Spectrometer (GC/MS): HP 7890A/5975C

4. *Calibration Evidence:* Copies of balance and microscope certificates are enclosed. Monthly Balance QC logs are provided (Rebecca Pontes' log is in her packet). GC/MS weekly tunes bracketing the dates of analysis (and the dates that the submissions were actually run on the GC/MS) on each instrument are also included, but not for the entire four month period of January 1, 2010 to April 1, 2010.

5. *Equipment Usage:* Refer to sample tables provided with GC and GC/MS data for the number of times that tests were conducted on their respective instruments (the dates that the instruments were used is not necessarily the same dates that the data was analyzed).

6. *Infrared Spectra*: Not used.

7. *Standard Spectras:* See included printouts (some in Rebecca Pontes' packet).

8. *Laboratory Policies:* See the Cocaine and Crack SOP as well as the Tablet SOP, which can be found in the discovery packet from Rebecca Pontes.

9. *Molecular Models:* See Standard Spectras sheets for cocaine and oxycodone, as well as additional Quetiapine Fumarate Molecular Information Sheet (in Rebecca Pontes' packet).

10. *Statistical Measuring Process:* No statistical measuring process used – just a visual comparison as well as a computer generated match quality.

11. *Confidence Level:* Match quality is printed on GC/MS data sheets.

12. *Independent Validation Techniques:* See the enclosed Scientific Working Group for the Analysis of Seized Drugs (SWGDRUG) Recommendations for the Methods of Analysis/Drug Identification section.

13. *Other data:* Mass Spectrometer Library.

14. *Error Rate:* Not known – get in contact with manufacturer (HP or Agilent).

15. *Computerized Spectral Library:* Both GC/MS instruments have 3 spectral libraries, 2 of which were created directly from the standards in the Drug Laboratory. The third library, a National Institute of Standards and Technology (NIST) library, came with the GC/MS equipment/program. The spectral search is set up to compare the unknown submission spectrum with the known spectrums in the 2 Drug Lab libraries first, and if no hits are found, to then search the NIST library to see if there are any matched there. For all of the submissions in this case, drug matches were found in the Drug Lab Libraries and therefore no search was done with the NIST library. In the submissions that were found to contain cocaine, the cutting agent levamisole was also determined to be present through the use of the NIST library.

16. *History of Analyst Discipline:* None of the chemists involved in this case have ever been disqualified from testing as an expert witness in drug identification in any jurisdiction.

17. *Laboratory Training Guidelines:* No written guidelines exist, though chemists go through at least one month of on the job training as well as continuous training as opportunities present themselves (i.e. with the identification of new designer drugs or for instrumentation seminars).

18. *Quality Assurance:* No actual manual – see enclosed SOPs for QA/QC of balances.

19. *Chain of Custody:* Included in each of the three case files.

20. *Documentation of Discrepancies and Errors:* None.

21. *Corrective Action Policies:* No formal written policies.

22. *Documentation of Corrective Actions for Discrepancies and Errors:* None.

23. *Accreditation:* The Lab is not accredited at this time, though we are starting the accreditation process again (we were going through the process about 5 years ago but our funding was dropped by the Commonwealth). All of our testing procedures performed are the same as in any accredited Drug Analysis Laboratory.

24. *Laboratory Personnel:* Sonja Farak's CV is included (not resume). Also included is Sharon Salem's CV (she checked our results to those printed on the certificates of analysis to make sure there were no reporting errors). No proficiency test results, testimony reviews, memberships in professional organizations, professional papers published, or teaching positions held by the chemists in this case. Job description is outlined in Rebecca Pontes' resume in her discovery packet.

25. *Evidence Audits:* None.

26. *Proficiency Testing:* None.

27. *Continuing Education:* No written Laboratory policies regarding this matter – we try to take courses/seminars when permitted per funding.